

EXHIBIT 3

# von Briesen

von Briesen & Roper, s.c. | Attorneys at Law

City of Sheboygan  
Attn: Ryan Sorenson, Mayor  
828 Center Avenue, Suite 300  
Sheboygan, WI 53081

Invoice Date: December 27, 2022  
Invoice Number: 413007  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through November 30, 2022*

**Matter:** Personnel Investigation  
**Matter Number:** 004236-00010

Total Fees	\$	10,741.50
Total Due This Invoice	\$	10,741.50

101144 - 531200  
2022 Expense

For any questions regarding this invoice or if you would like to receive invoices via email, please contact:  
Korrey J. Dickens at [korrey.dickens@vonbriesen.com](mailto:korrey.dickens@vonbriesen.com) or (414) 287-1382  
To pay your invoice via credit card, please visit: <https://vonbriesen.com/payments>  
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**Time Detail**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/09/22	JRM	Phone call concerning investigation matter.	0.30	94.50
11/10/22	JRM	Emails and phone call concerning investigation matter.	0.40	126.00
11/11/22	JPH	Intraoffice conference with Attorney Macy regarding nature and extent of investigation.	0.30	94.50
11/11/22	JRM	Emails concerning investigation matter.	0.30	94.50
11/12/22	JPH	Study open records requests issued by Administrator's counsel.	0.50	157.50
11/14/22	JPH	Telephone conference with client regarding investigation; investigation planning; begin review of background information regarding Administrator and his counsel.	2.10	661.50
11/16/22	JPH	Prepare directives to employee witnesses; begin initial identification of witnesses; preparation of engagement letter setting scope of investigation; begin process of reviewing records provided by client.	0.90	283.50
11/16/22	JRM	Emails concerning investigation matter.	0.30	94.50
11/17/22	JPH	Complete communication re: directives and engagement letter to client; exchange communications with City Attorney regarding directives and communications to Council; begin working through study of relevant documents provided by client.	1.20	378.00
11/18/22	JPH	Conduct review of records including media and internal and external email communications; complete identification of witnesses and convey information to City Attorney.	3.30	1,039.50
11/18/22	JRM	Emails and phone call concerning investigation matter; receipt and review of administrator employment agreement.	1.20	378.00
11/21/22	JPH	Exchange email communications with City Attorney regarding status; telephone conference with City Attorney regarding scope of investigation and other records developments.	0.50	157.50
11/22/22	JPH	Exchange email communication with client regarding issuance of directives; begin process of scheduling interviews; study communications sent to employee interviewees; review communication sent to City Administrator.	1.40	441.00
11/23/22	JPH	Study email communications from client regarding issuance of directives; send email communications to client regarding directives; begin interview planning.	0.80	252.00
11/27/22	JPH	Complete study of Administrator submission to Council; determine and implement	2.70	850.50

Shęboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

December 27, 2022  
413007  
004236-00010

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		communications regarding scheduling of interviews.		
11/28/22	JPH	Schedule interviews; continue study of documents in preparing for interviews; telephone conference with City Attorney regarding development involving appearance by Administrator Wolf; study communications to Administrator from City Attorney; prepare for interviews.	4.30	1,354.50
11/28/22	JRM	Emails concerning investigation matter.	0.30	94.50
11/29/22	JPH	Complete study of documentation in preparation for investigation interviews; conduct three investigation interviews; study email communications from Administrator counsel.	7.10	2,236.50
11/30/22	JPH	Conduct witness interviews.; study email communications from Wolf counsel and between City Attorney and Wolf counsel; exchange email communications with City Attorney; review additional information provided by interviewees.	6.20	1,953.00
Total Fees			34.10	\$10,741.50
Matter Total				\$10,741.50





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Total Due This Invoice	\$	10,741.50

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[www.vonbriesen.com](http://www.vonbriesen.com) 411 East Wisconsin Avenue, Suite 1000 Milwaukee, WI 53202-4409 Phone 414-276-1122 Fax 414-238-6446

# von Briesen

von Briesen & Roper, s.c. | Attorneys at Law

Sheboygan WI, City of  
Attn: Sandy Rohrick, Human Resources  
828 Center Avenue #100  
Sheboygan, WI 53081

Invoice Date: January 18, 2023  
Invoice Number: 414881  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through **December 31, 2022***

**Matter:** General Labor  
**Matter Number:** 004236-00003

Total Fees	\$	1,575.00
Total Costs	\$	<u>71.25</u>
Total Due This Invoice	\$	1,646.25

Please note that billing rates may be  
increased effective January 1, 2023

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Sheboygan, City of

Invoice Date: January 18, 2023  
Invoice Number: 414881  
Matter Number: 004236-00003

#### Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/06/22	JRM	Preparation for and meeting with City Attorney and attorney for City Administrator regarding pending matters; emails concerning same.	4.70	1,480.50
12/07/22	JRM	Receipt and review of emails an cease and desist letter regarding Administrator.	0.30	94.50
<b>Total Fees</b>			<b>5.00</b>	<b>\$1,575.00</b>

#### Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
12/30/22	vBR - 12/6/22, Travel to and from Sheboygan for meeting at City Hall	1.00	71.25
<b>Total Costs</b>			<b>\$71.25</b>
<b>Matter Total</b>			<b>\$1,646.25</b>

101144- 531200

# von Briesen

von Briesen & Roper, s.c. | Attorneys at Law

City of Sheboygan  
Attn: Ryan Sorenson, Mayor  
828 Center Avenue, Suite 300  
Sheboygan, WI 53081

Invoice Date: January 18, 2023  
Invoice Number: 414883  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through **December 31, 2022***

**Matter:** Personnel Investigation  
**Matter Number:** 004236-00010

Total Fees	\$ 20,632.50
Total Due This Invoice	\$ 20,632.50
Previous Balance Due	\$ 10,741.50
<b>Amount Due</b>	<b>\$ 31,374.00</b>

Please note that billing rates may be  
increased effective January 1, 2023

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Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

January 18, 2023  
414883  
004236-00010

# **Time Detail**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/01/22	JPH	Conduct three interviews of Sheboygan employees; study email communications provided to me by interviewee.	4.50	1,417.50
12/02/22	JPH	Conduct three investigation interviews; study documentation provided by individuals interviewed.	5.00	1,575.00
12/05/22	JPH	Conduct two witness interviews; exchange email communications with City Attorney regarding contact information for additional identified witnesses and his availability for interview; send email communications to non-employee witnesses; begin study of Wolf personnel file; exchange email communications with non-employee witnesses.	4.60	1,449.00
12/06/22	JPH	Conduct Director interview; exchange email communications with former employee declining interview; exchange email communication with counsel for outside parties; exchange email communication with former employee regarding waiver of privilege; study email communications provided by employee; video conference with counsel for two external individuals.	4.10	1,291.50
12/07/22	JPH	Conduct multiple interviews of witnesses; study administrator ethics guidance; study email communications from counsel for Administrator; exchange email communications with counsel for external witnesses.	4.10	1,291.50
12/08/22	JPH	Interview of former City employee; exchange email communications with counsel for external witnesses; continue review of ethical guidelines for administrators; exchange email communications with City employee.	2.10	661.50
12/09/22	JPH	Interview outside party regarding meeting allegations and communications; study documentation between Administrator and press and Sokolowski complaint materials.	1.90	598.50
12/12/22	JPH	Study interviews of current employees for purposes of follow up; send email correspondence to City Administrator counsel regarding interview; exchange email communications with Wolf counsel regarding his interview.	1.70	535.50
12/13/22	JPH	Exchange email communications with former employee; send email communication to Administrator counsel regarding scheduling interview; exchange email communications with City Attorney regarding status; study additional statement and information from Emily Rendall-Aruejo; study CLA reports submitted by employee;	2.80	882.00



Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

January 18, 2023  
414883  
004236-00010

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		exchange email communications with Emily Rendall-Aruejo; telephone conference with Ms. Rendall-Aruejo; telephone conference with City Attorney; study speech video and related transcript of speech given by Wolf's counsel to Sheboygan County Republicans.		
12/14/22	JPH	Exchange email communications with former employee witness regarding additional information; conduct interviews of non-employee external witnesses; study additional documentation of communications from non-employee external witnesses; review the appearance of Administrator counsel on Regular Joe Show; review transcript of speech by Administrator counsel to Sheboygan County Republican Party; communicate with employee witness regarding further information needed; send email communications to non-employee external witness seeking further information; exchange email communications with Administrator's counsel regarding his interview.	5.80	1,827.00
12/15/22	JPH	Exchange email communications with former employee witness regarding additional information; exchange email communications with employee witness; study additional documentation provided by employee witness.	0.50	157.50
12/16/22	JPH	Follow up telephone conferences with employee and non-employee witnesses; study calendar and notes provided by employee witness; exchange email communication with employee regarding documentation of meeting with the Collective and Administrator; study new media regarding Administrator claims; exchange email correspondence with Attorney Demaster regarding Wolf interview arrangements; conduct interview of Mayor; begin study of additional information provided by non-employees external witnesses.	4.40	1,386.00
12/18/22	JPH	Send email communication to Mayor regarding historical communications.	0.20	63.00
12/19/22	JPH	Study interviews and identify pertinent documents in preparing for interview of City Administrator; exchange email communications with the City Attorney regarding factual questions; send email communications to City employee with questions on her participation in pertinent meeting; hold telephone conference with City Attorney regarding email records and pertinent communications; draft directives to City Administrator and send to City Attorney for service.	6.70	2,110.50
12/19/22	RPH	Telephone correspondence with Attorney Hall to analyze confidentiality considerations related to	0.60	189.00

Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

January 18, 2023  
414883  
004236-00010

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		investigation and claims made by subject of same (.3); locate federal cases supporting confidentiality directives in public sector under First Amendment and share same with Attorney Hall for use in investigation (.3).		
12/20/22	JPH	Complete preparation for and conduct lengthy interview of Todd Wolf.	7.10	2,236.50
12/21/22	JPH	Study answers to questions provided by employee regarding facts related to critical meeting.	0.30	94.50
12/27/22	JRM	Emails and phone call concerning finalization of investigation and process for reporting out same.	0.40	126.00
12/27/22	JPH	Exchange multiple email communications with client regarding planning for discussion of investigation findings.	0.40	126.00
12/28/22	JPH	Begin compilation of findings and conclusions.	2.20	693.00
12/29/22	JPH	Continue preparation of findings and conclusions from investigation; complete review of pertinent documentation.	1.80	567.00
12/30/22	JPH	Continue review of records and interviews toward compilation of findings and conclusions.	4.30	1,354.50
<b>Total Fees</b>			<b>65.50</b>	<b>\$20,632.50</b>
<b>Previous Balance Due</b>				<b>\$10,741.50</b>
<b>Matter Total</b>				<b>\$31,374.00</b>





von Briesen & Roper, s.c. | Attorneys at Law

Sheboygan WI, City of  
Attn: Sandy Rohrick, Human Resources  
828 Center Avenue #100  
Sheboygan, WI 53081

Invoice Date: February 8, 2023  
Invoice Number: 416457  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through January 31, 2023*

**Matter:** General Labor  
**Matter Number:** 004236-00003

Total Fees	\$ 945.00
Total Due This Invoice	\$ 945.00
Previous Balance Due	\$ 1,646.25
<b>Amount Due</b>	<b>\$ 2,591.25</b>

101144-531200

Please note that the charges contained  
in this invoice may reflect increased  
rates as of January 1, 2023

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Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

February 8, 2023  
416457  
004236-00003

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**Time Detail**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/02/23	JRM	Emails and phone call concerning Administrator matter.	0.40	126.00
01/05/23	JRM	Phone conferences concerning administrator contract matter.	0.80	252.00
01/06/23	JRM	Phone call with City Administrator's counsel and phone call with City Attorney concerning status of contract.	0.60	189.00
01/12/23	JRM	Phone conferences concerning implementation issues with Administrator contract termination.	0.40	126.00
01/13/23	JRM	Email and phone conferences concerning City Administrator matter.	0.40	126.00
01/27/23	JRM	Phone call from new Human Resource Director concerning police department discipline matter.	0.20	63.00
01/27/23	JRM	Emails concerning City Administrator payout.	0.20	63.00
<b>Total Fees</b>			<b>3.00</b>	<b>\$945.00</b>
<b>Previous Balance Due</b>				<b>\$1,646.25</b>
<b>Matter Total</b>				<b>\$2,591.25</b>

# von Briesen

von Briesen & Roper, s.c. | Attorneys at Law

City of Sheboygan  
Attn: Ryan Sorenson, Mayor  
828 Center Avenue, Suite 300  
Sheboygan, WI 53081

Invoice Date: March 17, 2023  
Invoice Number: 420156  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through February 28, 2023*

**Matter:** Personnel Investigation  
**Matter Number:** 004236-00010

Total Fees	\$	2,803.50
Total Due This Invoice	\$	2,803.50

For any questions regarding this invoice or if you would like to receive invoices via email, please contact:  
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Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

March 17, 2023  
420156  
004236-00010

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**Time Detail**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/01/23	JPH	Interoffice conference with Attorney Macy regarding strategy around preparation of final report.	1.30	409.50
02/01/23	JRM	Further assistance in preparation of summary report; phone conference concerning same.	1.20	378.00
02/02/23	JPH	Revise and finalize draft of report to City.	2.20	693.00
02/03/23	JPH	Complete draft summary investigation report; telephone conference with Mayor regarding report; telephone conference with City Attorney regarding report.	2.10	661.50
02/06/23	JPH	Telephone conference with City Attorney regarding final terms in report; interoffice conference with Attorney Macy regarding final report.	0.50	157.50
02/07/23	JRM	Phone conference concerning finalized report; receipt and review of information concerning Wolf suit against City.	1.60	504.00
<b>Total Fees</b>			<b>8.90</b>	<b>\$2,803.50</b>
<b>Matter Total</b>				<b>\$2,803.50</b>

# von Briesen

von Briesen & Roper, s.c. | Attorneys at Law

City of Sheboygan  
Attn: Ryan Sorenson, Mayor  
828 Center Avenue, Suite 300  
Sheboygan, WI 53081

Invoice Date: May 16, 2023  
Invoice Number: 425770  
Attorney: James R. Macy  
Tax ID: 39-1576289

*For Professional Services through April 30, 2023*

**Matter:** Personnel Investigation  
**Matter Number:** 004236-00010

Total Fees	\$	126.00
Total Due This Invoice	\$	126.00

received  
5-23-23

For any questions regarding this invoice or if you would like to receive invoices via email, please contact:  
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Sheboygan, City of

Invoice Date:  
Invoice Number:  
Matter Number:

May 16, 2023  
425770  
004236-00010

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**Time Detail**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/04/23	JRM	Email request from City's insurance counsel regarding Wolf matter; review of file and response to request.	0.40	126.00
<b>Total Fees</b>			<b>0.40</b>	<b>\$126.00</b>
<b>Matter Total</b>				<b>\$126.00</b>